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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

BLITZ NV, LLC,

Debtor.

Case No. BK-S-23-13871-NMC

Chapter 7

**DECLARATION OF BRETT A. AXELROD IN
SUPPORT OF MOTION TO WITHDRAW AS
COUNSEL OF RECORD FOR BLITZ NV, LLC**

I, Brett A. Axelrod, hereby declare as follows:

1. I am a partner of Fox Rothschild LLP (“Fox”), which maintains offices at, among other locations: 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135.
2. Fox is counsel for Debtor Blitz NV, LLC (“Blitz” or “Debtor”) in the above-referenced Chapter 7 proceedings.
3. I am over the age of 18, am mentally competent, have personal knowledge of the facts in this matter, except where stated as based upon information and belief, and if called upon to testify, could and would do so.
4. I make this Declaration in support of the *Motion to Withdraw as Counsel of Record for Blitz NV, LLC* (the “Motion”).
5. On September 5, 2023, Blitz NV entered into an Engagement Agreement with Fox whereby Fox would represent Blitz NV in its Chapter 11 Bankruptcy proceeding (the “Bankruptcy Case”) and Fox has represented Blitz NV in the Bankruptcy Case pursuant to the terms of the Engagement Agreement.

1 6. Fox has performed substantial legal work in the Bankruptcy Case, fulfilling its
2 obligations to Blitz NV under the Engagement Agreement.

3 7. There exist irreconcilable differences between Blitz NV and Fox which require
4 Fox to withdraw; therefore necessitating the filing of the instant Motion.

5 8. Further, Blitz NV has been advised in writing and understands that withdrawal
6 will occur due to the irreconcilable differences between Blitz NV and Fox. Fox has advised
7 Blitz NV of the impending withdrawal.

8 9. Fox's withdrawal as counsel of record will not adversely affect Blitz NV because
9 Blitz NV has been advised of all upcoming deadlines.

10 10. In the event Blitz NV obtains substitute counsel, Fox is willing to execute a
11 Substitution of Counsel in order to avoid causing any delays in these proceedings.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct to the best of my knowledge, information and belief.

14 Dated this 10th day of October, 2024.

15 /s/ Brett Axelrod

16 Brett Axelrod